

November 13, 2001

Mr. Lou Arms
Createc Corporation
U. S. 27 North
Portland, Indiana 47371

Re: **075-14862-00024**
Second Administrative Amendment to
FESOP 075-7992-00024

Dear Mr. Arms:

Createc Corporation was issued a permit on June 27, 1997 for a stationary foam packaging material manufacturing plant. A letter requesting the addition of four (4) polystyrene molding presses and one (1) polystyrene pre-expander and a change in the responsible official, was received on September 25, 2001. Pursuant to the provisions of 326 IAC 2-8-10(a)(2) and (14), the permit is hereby administratively amended as follows:

1. Condition A.1:

Createc Corporation requests that the responsible official listed in Condition A.1 be changed from Dave Claerbout to Lou Arms. Thus, Condition A.1 shall be changed as follows:

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary foam packaging material manufacturing plant.

Responsible Official:	Dave Claerbout, Chief Financial Officer Lou Arms, General Manager
Source Address:	U. S. 27 North, Portland, Indiana 47371
Mailing Address:	U. S. 27 North, Portland, Indiana 47371
SIC Code:	3086
County Location:	Jay County
County Status:	Attainment for all criteria pollutants
Source Status:	FESOP PSD Minor Source

2. Condition A.2 and the Unit Description of Section D.2:

Createc also requests the addition of four (4) polystyrene molding presses and one (1) polystyrene pre-expander via an administrative amendment, pursuant to 326 IAC 2-8-10(a)(14), which states an administrative amendment to a FESOP is a revision that... incorporates a modification that adds an emissions unit or units of the same type that are already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit or units, except if the modification would result in a potential to emit greater than the thresholds in 326 IAC 2-2 or 326 IAC 2-3.

Upon review of the permit, it is determined that the proposed units, the same type as those already permitted, will comply with the same applicable requirements, permit terms, and conditions as the existing units, and do not trigger any new applicable requirements or changes to the existing limitations. In addition, the source is permitted via a FESOP. Thus, the source PTE will be less than the major source thresholds under 326 IAC 2-2 and 2-3.

Therefore, the proposed units shall be added to the FESOP via an administrative amendment as requested, with the changes to the permit including the source unit description of Condition A.2 and the unit description of Section D.2.

The changes to Condition A.2 are as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) boiler, B1, natural gas-fired with #2 fuel oil backup, rated at 11.0 MMBtu per hour, exhausting at stack BS1 and one (1) boiler, B2, natural gas-fired with #2 fuel oil backup, rated at 11.9 MMBtu per hour, exhausting at stack BS2.
- (2) One (1) manufacturing line consisting of the following:
 - (a) ~~Sixteen~~**Twenty (4620)** molding machines with a combined capacity of 1,210 pounds per hour of expanded polystyrene beads, and exhausting to stacks F-1 through F-5.
 - (b) ~~Two~~**Three (23)** pre-expanders, with a combined capacity of 1,210 pounds per hour of expanded polystyrene beads, and exhausting to stacks F-1 through F-5.

The changes to the unit description of the unit description of Section D.2 are as follows:

One (1) manufacturing line consisting of the following:

- (a) ~~Sixteen~~**Twenty (4620)** molding machines with a combined capacity of 1,210 pounds per hour of expanded polystyrene beads, and exhausting to stacks F-1 through F-5.
- (b) ~~Two~~**Three (23)** pre-expanders, with a combined capacity of 1,210 pounds per hour of expanded polystyrene beads, and exhausting to stacks F-1 through F-5.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

SDF

cc: File - Jay County
U.S. EPA, Region V
Jay County Health Department
Air Compliance Section Inspector - Dave Rice
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

Createc Corporation
Portland, Indiana
Permit Reviewer: SDF

Second Administrative Amendment: 075-14862-00024
Amended By: SDF

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F 075-7992-00024

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**Createc Corporation
U.S. 27 North
Portland, Indiana 47371**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F075-7992-00024	Date Issued: June 27, 1997
First Administrative Amendment No.: F075-9051-00024	Date Issued: February 10, 1998
Second Administrative Amendment No.: F075-14862-00024	Affected Pages: 4, 26
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 13, 2001

SECTION A SOURCE SUMMARY

This permit is based on information presented in the permit application and any information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and submitted to IDEM, OAQ.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary foam packaging material manufacturing plant.

Responsible Official: Lou Arms, General Manager
Source Address: U. S. 27 North, Portland, Indiana 47371
Mailing Address: U. S. 27 North, Portland, Indiana 47371
SIC Code: 3086
County Location: Jay County
County Status: Attainment for all criteria pollutants
Source Status: FESOP
PSD Minor Source

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) boiler, B1, natural gas-fired with #2 fuel oil backup, rated at 11.0 MMBtu per hour, exhausting at stack BS1 and one (1) boiler, B2, natural gas-fired with #2 fuel oil backup, rated at 11.9 MMBtu per hour, exhausting at stack BS2.
- (2) One (1) manufacturing line consisting of the following:
 - (a) Twenty (20) molding machines with a combined capacity of 1,210 pounds per hour of expanded polystyrene beads, and exhausting to stacks F-1 through F-5.
 - (b) Three (3) pre-expanders, with a combined capacity of 1,210 pounds per hour of expanded polystyrene beads, and exhausting to stacks F-1 through F-5.

A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Twenty-one (21) comfort heaters, natural gas-fired, with a heat input capacity of 0.15 MMBtu per hour each.
- (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (3) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (4) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (5) Cleaners and solvents characterized as follows:
 - (A) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100EF) or;

SECTION D.2 FACILITY OPERATION CONDITIONS

One (1) manufacturing line consisting of the following:

- (a) Twenty (20) molding machines with a combined capacity of 1,210 pounds per hour of expanded polystyrene beads, and exhausting to stacks F-1 through F-5.
- (b) Three (3) pre-expanders, with a combined capacity of 1,210 pounds per hour of expanded polystyrene beads, and exhausting to stacks F-1 through F-5.

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOCs) [326 IAC 2-8]

- (a) The manufacturing line shall be limited to a raw material throughput (based on 5.75% VOC emission factor) of 1560.34 tons of expanded polystyrene (EPS) beads per consecutive twelve (12) month period, rolled on a monthly basis. This throughput limit is equivalent to VOC emissions from the manufacturing line of 89.72 tons of VOC per consecutive twelve (12) month period, rolled on a monthly basis.
- (b) This raw material throughput limit effectively lowers individual HAP emissions (based on 0.5% HAP emissions) below 9.0 tons per twelve (12) consecutive month period, rolled on a monthly basis, and total HAP emission below 24.0 tons per twelve (12) consecutive month period, rolled on a monthly basis. Therefore, the requirements of 326 IAC 2-7 (Part 70 permits) and 326 IAC 2-2 (PSD) do not apply.

Testing Requirements [326 IAC 2-8-4(3)]

Testing of this facility is not required by this permit. This does not preclude testing requirements on this facility under 326 IAC 2-1-4(f).

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the manufacturing line.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.2.3 Record Keeping Requirements

The Permittee shall maintain records to document compliance with Conditions D.2.1. These records shall be maintained in accordance with Section C - General Record Keeping Requirements. These records shall include a minimum of the following:

- (a) The raw material throughput of the manufacturing line.

Records maintained for this condition shall be taken monthly, and shall be complete and sufficient to establish compliance with the raw material usage limits and VOC emission limits established in Condition D.2.1.